

SK:APW
F. #2020R00673

FILED
IN CLERK'S OFFICE
U.S. DISTRICT COURT E.D.N.Y.

★ FEB 17 2021 ★

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

LONG ISLAND OFFICE

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UNITED STATES OF AMERICA

INDICTMENT

- against -

ELIJAH SONG,

Defendant.

CR 21 089

Cr. No. _____
(T. 18, U.S.C., §§ 844(c)(1), 844(f)(1),
982(a)(2), 982(b)(1) and 3551 et seq.;
T. 21, U.S.C., § 853(p))

JOHNSON, JR. J.

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THE GRAND JURY CHARGES:

COUNT ONE
(Arson)

BULSARA, M.J.

1. On or about June 14, 2020, within the Eastern District of New York, the defendant ELIJAH SONG did knowingly, intentionally and maliciously damage and destroy, and attempt to damage and destroy, by means of fire, a building and other personal and real property, to wit: a New York City Department of Transportation ("NYCDOT") traffic enforcement camera located at 42-12 Murray Street in Queens, New York, in whole or in part owned and possessed by, and leased to, one or more institutions and organizations receiving Federal financial assistance, to wit: the NYCDOT and New York City government.

(Title 18, United States Code, Sections 844(f)(1) and 3551 et seq.)

COUNT TWO
(Arson)

2. On or about June 22, 2020, within the Eastern District of New York, the defendant ELIJAH SONG did knowingly, intentionally and maliciously damage and

destroy, and attempt to damage and destroy, by means of fire, a building and other personal and real property, to wit: an NYCDOT traffic enforcement camera located at 144-54 Sanford Avenue in Queens, New York, in whole or in part owned and possessed by, and leased to, one or more institutions and organizations receiving Federal financial assistance, to wit: the NYCDOT and New York City government.

(Title 18, United States Code, Sections 844(f)(1) and 3551 et seq.)

COUNT THREE
(Arson)

3. On or about July 17, 2020, within the Eastern District of New York, the defendant ELIJAH SONG did knowingly, intentionally and maliciously damage and destroy, and attempt to damage and destroy, by means of fire, a building and other personal and real property, to wit: an NYCDOT traffic enforcement camera located at 144-60 Sanford Avenue in Queens, New York, in whole or in part owned and possessed by, and leased to, one or more institutions and organizations receiving Federal financial assistance, to wit: the NYCDOT and New York City government.

(Title 18, United States Code, Sections 844(f)(1) and 3551 et seq.)

COUNT FOUR
(Arson)

4. On or about July 17, 2020, within the Eastern District of New York, the defendant ELIJAH SONG did knowingly, intentionally and maliciously damage and destroy, and attempt to damage and destroy, by means of fire, a building and other personal and real property, to wit: an NYCDOT traffic enforcement camera located at 50-48 Utopia Parkway in Queens, New York, in whole or in part owned and possessed by, and leased to, one or

more institutions and organizations receiving Federal financial assistance, to wit: the NYCDOT and New York City government.

(Title 18, United States Code, Sections 844(f)(1) and 3551 et seq.)

COUNT FIVE
(Arson)

5. On or about July 18, 2020, within the Eastern District of New York, the defendant ELIJAH SONG did knowingly, intentionally and maliciously damage and destroy, and attempt to damage and destroy, by means of fire, a building and other personal and real property, to wit: an NYCDOT traffic enforcement camera located at the intersection of Northern Boulevard and Douglaston Parkway in Queens, New York, in whole or in part owned and possessed by, and leased to, one or more institutions and organizations receiving Federal financial assistance, to wit: the NYCDOT and New York City government.

(Title 18, United States Code, Sections 844(f)(1) and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION

6. The United States hereby gives notice to the defendant that, upon his conviction of any of the offenses charged herein, the government will seek forfeiture in accordance with: (a) Title 18, United States Code, Section 844(c)(1), which requires any person convicted of such offenses to forfeit any explosive materials involved or used or intended to be used in any violation of Title 18, United States Code, Section 844; and (b) Title 18, United States Code, Section 982(a)(2), which requires any person convicted of such offenses to forfeit any property constituting, or derived from, proceeds obtained directly or indirectly as a result of such offenses.

7. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be

divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

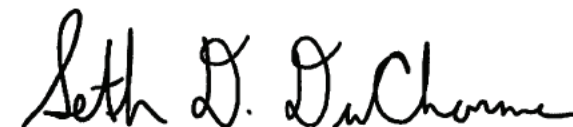
(Title 18, United States Code, Sections 844(c)(1), 982(a)(2) and 982(b)(1);

Title 21, United States Code, Section 853(p))

A TRUE BILL



FOREPERSON



SETH D. DUCHARME
ACTING UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

F. #2020R00673
FORM DBD-34
JUN. 85

No. _____

UNITED STATES DISTRICT COURT

EASTERN *District of* NEW YORK

CRIMINAL DIVISION

THE UNITED STATES OF AMERICA

vs.

ELIJAH SONG,

Defendant.

INDICTMENT

(T. 18, U.S.C., §§ 844(c)(1), 844(f)(1), 982(a)(2), 982(b)(1) and 3551
et seq.; T. 21, U.S.C., § 853(p))

A true bill.

Foreperson

Filed in open court this _____ *day,*

of _____ *A.D. 20* _____

Clerk

Bail, \$ _____

Andrew Wenzel, Assistant U.S. Attorney (718) 254-6466